

EXHIBIT B

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
WINCHESTER DIVISION**

CRISTOBAL PASCUAL, DAVID)	
JIMENEZ, and OSCAR PARRA, on behalf)	
of themselves and all similarly situated)	
individuals)	COLLECTIVE ACTION
)	
<i>Plaintiffs,</i>)	CASE NO. 4:14-cv-00008
)	
v.)	Judge Harry S. Mattice, Jr.
)	Magistrate Judge Susan K. Lee
CORSICANA BEDDING, INC.,)	
)	
<i>Defendant.</i>)	

[PROPOSED] NOTICE OF PENDING FAIR LABOR STANDARDS ACT LAWSUIT

To: All current and former production employees of Corsicana Bedding, Inc. who have worked at the Shelbyville, Tennessee mattress factory at any time between February 3, 2011 to the present and who were paid piece rate at any time during this period.

I. INTRODUCTION

The purpose of this Notice is to inform you of the existence of a collective action lawsuit in which you may have the right to join, to advise you of the nature of the lawsuit and how it might affect your rights, and to provide information to you on the procedure for participating in this lawsuit if you qualify and so desire. This is your decision, and you have no obligation to participate in this lawsuit or to respond to this Notice.

This Notice is for the sole purpose of determining the identity of those persons who wish to be involved in this case. Although the United States District Court for the Eastern District of Tennessee has authorized this Notice, the Court has taken no position regarding the merits of the claims contained in the lawsuit or the Defendant's defenses.

II. DESCRIPTION OF THE LAWSUIT

This lawsuit is filed against Corsicana Bedding, Inc. by Plaintiffs Cristobal Pascual, David Jimenez, and Oscar Parra, who worked at the company's Shelbyville, Tennessee mattress factory.

Plaintiffs allege that Defendant failed to pay its piece rate workers all of the overtime those workers were entitled to receive. Specifically, Plaintiffs allege that Defendant paid a lower overtime rate than they were required by law to pay, based on Defendants' alleged refusal to calculate all hours worked.

This lawsuit seeks to recover alleged unpaid overtime wages, an equal amount in statutory damages, and attorney's fees and litigation expenses.

Defendant disputes that any of its employees were improperly denied or underpaid overtime wages. More broadly, Defendant asserts that Plaintiff's claims are legally and factually unfounded.

The Court has not yet ruled on the merits of the claims asserted in this lawsuit or on the denials and other defenses raised by Defendant. Thus, at this time, the right to recovery for any worker has not been established and is not guaranteed or certain.

III. HOW TO JOIN THIS LAWSUIT

If you are a current or former employee of Corsicana Bedding, Inc. who worked as a piece rate employee at its mattress factory in Shelbyville, Tennessee at any time since February 3, 2011, you may join this suit by completing, signing, and mailing the enclosed "Consent to Join and Participate as a Party Plaintiff," to Plaintiff's counsel, postmarked on or before **[Insert specific date 45 days from the date the notice is post-marked and mailed to potential class members]**. A self-addressed, postage-prepaid envelope has been enclosed for your convenience.

You are not required to join this lawsuit, and if you do not want to join this lawsuit, you do not need to do anything.

The law firm Barrett Johnston, LLC has agreed to represent the Plaintiffs in this case. By signing and mailing the enclosed "Consent to Join and Participate as a Party Plaintiff," you agree to be represented by Barrett Johnston, LLC in this litigation. Barrett Johnston, LLC is not charging you an hourly fee for their services. Their fee is set up on a contingency basis, and any money owed to them will only be collected after the completion of the lawsuit, and only if the lawsuit is successful.

Failure to timely return the properly completed and signed "Consent to Join and Participate as a Party Plaintiff" within 45 days as noted above will result in you not being able to participate in this lawsuit. You must have the enclosed form filed with the Court in order to participate in this lawsuit and share in any monetary recovery, if any.

IV. NO RETALIATION PERMITTED

Federal law prohibits Defendant from discharging you or otherwise taking any adverse employment action against you or discriminating against you for joining this lawsuit.

V. YOUR RIGHT TO DECLINE PARTICIPATION IN THIS LAWSUIT

You are not required to participate in this lawsuit. If you do not wish to participate in this lawsuit or you wish to bring your own lawsuit, you do not have to do anything at this time. You are free to retain an attorney other than the attorneys listed in Section III above to seek independent legal advice or representation.

VI. EFFECT OF JOINING THE LAWSUIT

If you join the lawsuit and qualify, you will be bound by the judgment of the Court. If Plaintiffs win, you may be eligible for a damages award; if Plaintiffs lose, no damages will be awarded and you will not be able to file another lawsuit regarding unpaid wages or overtime. While the suit is proceeding, you may be required to provide information, respond to the Defendant's discovery requests, testify at a deposition, or testify before the Court in Winchester, Tennessee.

VII. EFFECT OF NOT JOINING THE LAWSUIT

If you choose not to join this lawsuit, you will not be bound by the Court's decisions and you will not be entitled to share in any damages award if the Court rules for Plaintiffs. In addition, if you do not join in this lawsuit or file a lawsuit of your own, the time limit for action on any unpaid wages or overtime claims you may have will continue to run and may cause your claim to be barred by the statute of limitations.

VIII. NO OPINION EXPRESSED AS TO THE MERITS OF THE CASE

This notice has been authorized by Judge Harry S. Mattice of the United States District Court for the Eastern District of Tennessee solely for the purpose of notifying individuals of the lawsuit. The Court has taken no position in this case regarding the merits of Plaintiffs' claims or Defendant's defenses to these claims.

IX. FURTHER INFORMATION

The pleadings and other documents of record in this lawsuit may be examined and copied at any time during regular business hours at the office of the Clerk of the United States District Court for the Eastern District of Tennessee located at 900 Georgia Avenue Chattanooga, Tennessee, 37402.

If you have any questions about this Notice, the deadline for filing a Consent Form, or any other questions, you may contact the law offices of Barrett Johnston, LLC by calling (615) 244-2202.